

WEIL, GOTSHAL & MANGES LLP
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (650) 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:
PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BY AND BETWEEN
REORGANIZED DEBTORS AND
CAL FIRE REGARDING DEADLINE
FOR REORGANIZED DEBTORS TO
OBJECT TO CLAIMS**

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
2 “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
3 Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**
4 **11 Cases**”), on the one hand, and the California Department of Forestry and Fire Protection,
5 (“**CAL FIRE**,” and together with the Debtors and the Reorganized Debtors, the “**Parties**”), on
6 the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On January 29, 2019, the Debtors commenced these Chapter 11 Cases in the United
9 States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The
10 Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule
11 1015(b) of the Federal Rules of Bankruptcy Procedure.

12 B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the
13 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
14 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from
15 time to time, and together with any exhibits or schedules thereto, the “**Plan**”).¹ The Effective Date
16 of the Plan occurred on July 1, 2020. *See* Dkt. No. 8252. Pursuant to Section 7.1 of the Plan (as
17 approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to
18 Claims until the later of (i) one hundred and eighty (180) days after the Effective Date (i.e.,
19 December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause
20 shown. Plan § 7.1.

21 C. On October 27, 2020, the Reorganized Debtors filed the *Motion for Entry of an*
22 *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9355],
23 which the Court granted with certain limited modifications in the *Order Extending Deadline for*
24 *the Reorganized Debtors to Object to Claims* [Dkt. No. 9563] (the “**First Extension Order**”).
25
26

27 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the
28 Plan or Confirmation Order.

1 The First Extension Order extended the Reorganized Debtors' deadline under Section 7.1 of the Plan
2 to object to Claims by one hundred eighty (180) days, through and including June 26, 2021.

3 D. On March 17, 2021, the Reorganized Debtors filed the *Motion for Entry of an Order*
4 *Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*
5 [Dkt. No. 10409], which the Court granted, with modifications, in the *Order Further Extending*
6 *Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief* [Dkt. No.
7 10494] (the "**Second Extension Order**"). The Second Extension Order further extended the
8 Reorganized Debtors' deadline under Section 7.1 of the Plan to object to Claims by one hundred
9 eighty (180) days, through and including December 23, 2021, except that the deadline for the
10 Reorganized Debtors to object to CAL FIRE Claims was extended through and including September
11 30, 2021, without prejudice to the right of the Reorganized Debtors to move for further extensions of
12 all such dates. (As used here, "**CAL FIRE Claims**" means Class 4B Utility General Unsecured
13 Claims of CAL FIRE enumerated in the *Limited Objection of California Department of Forestry and*
14 *Fire Protection to Motion for Entry of an Order Further Extending Deadline for the Reorganized*
15 *Debtors to Object to Claims and for Related Relief* [Docket No. 10480].)

16 E. The Parties have resolved 14 CAL FIRE Claims. To allow time for continued
17 progress towards resolution of the remaining two CAL FIRE Claims, the Parties believe that it will
18 be mutually beneficial to further extend the deadline for the Reorganized Debtors to object to CAL
19 FIRE Claims, as set forth below.

20 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
21 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
22 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
23 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**
24 **TO ORDER, THAT:**

- 25 1. The objection deadline for CAL FIRE Claim No. 79338 shall be November 15, 2021.
- 26 2. The objection deadline for CAL FIRE Claim No. 65505 shall be December 23, 2021.
- 27 3. This Stipulation shall constitute the entire agreement and understanding of the Parties
28 relating to the subject matter hereof and shall supersede all prior agreements and understandings
relating to the subject matter hereof.

1 4. This Stipulation may be executed in counterparts, each of which shall be deemed an
2 original, but all of which together shall constitute one and the same agreement.

3 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
4 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

5
6 Dated: September 24, 2021

7 KELLER BENVENUTTI KIM LLP

ROB BONTA Attorney General of California
DANETTE VALDEZ, SBN 141780
ANNADEL ALMENDRAS, SBN 192064
Supervising Deputy Attorneys General

8
9 /s/ David A. Taylor

10 David A. Taylor
11 *Attorneys for Debtors and*
12 *Reorganized Debtors*

/s/ Paul J. Pascuzzi

PAUL J. PASCUZZI
FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP
Attorneys for California Department of
Forestry and Fire Protection